

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

DEC 07 2017

Clerk of Court

United States of America

v.

1. Edgar Alberto REYNA-Riojas (1994/MX)
2. Diana Romelia RIOJAS-Vazquez (1968/MX)

Case No.

M-17-2229-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 6, 2017 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

Code Section

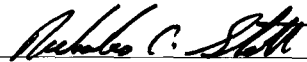
Offense Description

21 USC § 963

Conspiracy to Import a Controlled Substance / Approximately 187.34  
 Kilograms of Marijuana a Schedule I Controlled Substance.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Complainant's signature

Nicholas C. Stott, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/07/2017

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Dorina Ramos

Printed name and title

**Attachment "A"**

I, Nicholas C. Stott, am a Special Agent of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On December 6, 2017, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection (CBP) Office of Field Operations at the Progreso Port of Entry (POE) in Progreso, Texas. CBP Officers (CBPOs) detained Edgar Alberto REYNA-Riojas (hereinafter REYNA), a citizen of Mexico and B1/B2 visa holder, while attempting to enter the U.S. with approximately 187.34 kilograms (kg) of marijuana concealed within a false floor of a trailer attached to a tractor unit.
2. During primary inbound inspection, CBP Officers (CBPOs) obtained a negative written declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00. CBPOs referred REYNA and the tractor trailer for a non-intrusive X-Ray inspection and discovered anomalies in the floor of the trailer.
3. CBPOs referred the REYNA and the tractor trailer to the cargo secondary inspection area where a CBP K-9 narcotics detection team conducted a free air inspection which resulted in a positive alert for the odor of controlled substance(s) emanating from the trailer.
4. A physical search of the trailer discovered a false floor consisting of two compartments in the trailer. Inside the compartments, 110 cellophane wrapped packages were discovered. CBPOs field tested the substance inside the packages, which was positive for the characteristics of marijuana.
5. A Homeland Security Investigations (HSI), Special Agent (SA) responded to the Progreso POE to assist in the investigation. The HSI SA and CBPO interviewed REYNA who stated (post-Miranda warning and waiver) he was hired by unknown persons in Mexico to transport the trailer and what REYNA knew to be marijuana from Neuvo Progreso, Mexico to Mission, Texas. REYNA stated he was to be paid \$1,500.00 USD for transporting the marijuana. REYNA stated his mother, and owner of the tractor, Diana Romelia RIOJAS-Vazquez (hereinafter RIOJAS) had arranged for the transportation with unknown persons in Mexico and was also to be paid for the delivery of the marijuana.
6. RIOJAS, a citizen of Mexico and B1/B2 visa holder, arrived at the Progreso POE looking for REYNA, and after observing the aforementioned tractor trailer in the secondary inspection area, entered the immigration office at the POE. RIOJAS agreed to speak with the HSI SA and CBPO regarding REYNA's entry into the United States. During the interview (post-Miranda warning and waiver), RIOJAS admitted she was hired by unknown persons in Mexico to have the trailer containing what she suspected to be drugs transported into the United States. RIOJAS stated she was to be paid an unknown amount for arranging the transport. RIOJAS stated she directed REYNA to transport the trailer into the United States.
7. REYNA and RIOJAS will be charged with Conspiracy to Import a Controlled Substance, in violation of 21 USC § 963.